



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Seattle, WA 98101

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05 AUG 2004

Reply To
Attn Of: AWT-121

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Peter Jewitt
Farallon Consulting L.L.C.
320 Third Avenue, N.E., Suite 200
Issaquah, WA 98027

William S. Johnson
Earle M. Jorgensen Company
10650 South Alameda
Lynnwood, CA 90262

**Re: Jorgensen Forge Facility
Administrative Order on Consent, U.S. EPA Docket No CERCLA
10-2003-0111
Second Draft Environmental Sampling Work Plan**

Dear Mr. Jewitt and Mr. Johnson:

The U.S. Environmental Protection Agency (EPA) has reviewed the document entitled Second Draft Environmental Sampling Work Plan, Jorgensen Forge Facility (Work Plan). This document is dated May 12, 2004. In accordance with Paragraphs 27 and 29 of the above-referenced Administrative Order on Consent, EPA approves the Work Plan subject to the following modifications shown below in *italics*.

1. Page 1-3, Section 1.4.2, Description of Problem, Fourth Bullet -

The fourth bullet on page 1-3 states that potential fate and transport mechanisms for polychlorinated biphenyls (PCBs) exist and include stormwater conveyance and erosion. *"Disposal of solids" is added to this bullet.* EPA and the Washington Department of Ecology (Ecology) conducted a seep survey during May, 2004. Masses of welded metal were discovered off more than one of the Jorgensen Forge outfalls. In addition, during the survey EPA noted that an oil sheen was present along nearly the entire Jorgensen Forge reach, but without evidence of a particular point of entry such as an outfall. Metal and debris that has been dumped in the Lower Duwamish Waterway (LDW) is an additional transport pathway for PCBs and metals that is not



mentioned in the Work Plan. The last paragraph of this section is modified as follows: *The second phase of investigation is to determine whether concentrations of PCBs and/or metals exist above the selected screening levels in the fill material on or near the shoreline of the LDW and if the release of PCBs and/or metals from the stormwater conveyance system could have resulted in PCBs and/or metals in sediment in the LDW adjacent to the Site. If the results of the second phase of the investigation determine that there are, or have been sources of PCBs and/or metals in the fill material or from the outfalls, sampling and analysis of sediment samples may be necessary.*

2. Page 1-4, Section 1.4.2, Description of Problem, Last Sentence -

EPA believes that there are data gaps which remain that were not adequately addressed in the first phase of the investigation. For example, the Work Plan gives limited consideration to the activities which occurred in the area of the former Bethlehem Steel facility, citing only a personnel communication (Section 3.1.1). The areal photo (Figure 9 of the Work Plan) shows a substantial Bethlehem Steel facility which also happens to be adjacent to the more contaminated portion of the Lower Duwamish Waterway. Therefore, the last word of this sentence is changed from "demonstrates" to "suggests."

3. Page 1-6, Section 1.4.7, Decision Rules -

EPA expects a numeric rule to be stated in the second bullet of this paragraph. Cleanup values under the Sediment Management Standards must meet the Cleanup Screening Level (CSL) and may have to meet the Sediment Quality Standards (SQS). The second bullet of Section 1.4.7 is modified as follows: *Determining whether PCBs occur in the sampled fill and debris material at concentrations in excess of the Lower Apparent Effects Threshold (LAET) and 2LAET. If PCBs in the sampled material exceed the LAET or 2LAET criteria, then these concentrations will be compared to the State of Washington Sediment Management Standards (SMS).*

4. Pages 1-6 & 1-7, Section 1.4.7, Decision Rules, Last Paragraph -

EPA agrees that the need for sediment data is not predicated on establishing a release from the site as stated in the first sentence of this paragraph. However, the first sentence contradicts the last part of the second sentence. The second sentence is modified by deleting the following language "by a release of PCBs from the Site."

5. Page 1-7, Section 1.4.8, Tolerable Limits on Decision Errors

EPA disagrees that there will be sufficient samples for statistical analysis of contaminant distributions. The Work Plan describes a reconnaissance survey to determine the presence or absence of contamination. The first half of the second sentence of this paragraph is modified to read as follows: "In general, there will be sufficient samples to determine the presence or absence of contamination, and PQLs..."

6. Page 3-19, Section 3.4, PCB Migration Pathway Evacuation Summary, Offsite Pathways, Second Bullet -

Please see comment No. 1 above for rationale. This bullet is changed to read as follows: "Erosion and placement of bank material (soil or debris) on sediment."

7. Page 3-20, Section 3.4, PCB Migration Pathway Evacuation Summary, Last Paragraph -

No information has been produced which documents that contaminated sediment from T-117 Malarkey has been deposited on areas adjacent to the Jorgensen Forge facility. The first sentence of this paragraph is modified by deleting "Terminal 117 Malarkey".

8. Page 6-2, Section 6.1.2, Subsurface Fill Sampling and Analysis, Second Sentence -

Only five (not seven) soil borings are located along the shoreline near outfalls 4 through 9. Therefore the first part of this sentence is changed to read: "The five proposed boring locations....."

9. Page 6-1, Section 6 Scope of Work for the Environmental Sampling, Second Paragraph -

Please see Comment No. 1 for rationale. The paragraph is modified as follows: The results of the first phase of investigation identified that insufficient data are available to determine whether there is the potential for PCBs and/or metals in fill on the shoreline and in the metal/debris piles, that have been dumped in the LDW, to migrate into the LDW or if the outfalls have been a pathway for PCB and/or metals migration to the LDW. To address these data gaps, the scope of work includes collection of debris piles samples, fill samples ... Sediment

within catch basins will be collected for laboratory analysis to determine if PCBs and/or metals have been released... The objective of the Environmental Sampling is to collect sufficient information to determine whether erosion of uncharacterized fill/soil and the metals debris piles located along the shoreline bank of the LDW, or if the outfalls are, or have been a contributing source of PCBs and/or metals to sediment.

10. Page 6-2, Section 6.1.3, Catch Basin Sampling -

The Section is modified to add the following sentence after the fifth sentence: *If not enough material is present from a specific catch basin to analyze for PCBs, samples from one or more catch basins that are located near each other may be combined.*

11. Appendix B-1, Field Sampling Plan (FSP), Table 4, & Quality Assurance Project Plan (QAPP), Section 2.1 -

The practical quantitation limit (PQL) for PCBs of 0.1 milligrams per kilogram which is proposed in the FSP and QAPP is too high and must be consistent with samples previously taken throughout the LDW. The FSP and QAPP are modified to include the PQL for PCBs to be at a minimum be 0.033 milligrams per kilogram (wet weight), which is achievable using EPA method 8082.

Should you have questions or comments, please don't hesitate to call me at 206/553-5122.

Sincerely,



Anna I. Filutowski
RCRA/CERCLA Project Manager

cc: Ron Altier, Jorgensen Forge Corporation
William Ernst, The Boeing Company
Laurie Geissinger, Seattle City Light
Peter Jewitt, Farallon Consulting
David Templeton, Anchor Environmental
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REMARKS

JoAnne - Please send this.

05 AUG 2004

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Thank you - Anne

P.S. If you need ~~at~~ help with addresses - please call Howard
x 2851

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How glad we have you I & P
know it is really - something

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